

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
Plaintiff)	
)	
v.)	Case No. 20-cv-423-JFH
)	
JEFFREY LOWE,)	
)	
LAUREN LOWE,)	
)	
GREATER WYNNEWOOD EXOTIC)	
ANIMAL PARK, LLC. and)	
)	
TIGER KING, LLC.)	
)	
Defendants.)	

MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANTS

The undersigned, Daniel J. Card, pursuant to LCvR 83.5, respectfully moves to withdraw as attorney of record for the Defendants. Counsel shows the Court as follows:

1. The Undersigned entered his appearance for all Defendants on November 30, 2020.
2. Clients have failed to retain new counsel since the Court's March 30 Order.
3. Since then, a conflict has arisen among the multiple clients/Defendants and attorney such that continued representation is impossible without violating ethical rules.
4. Further, for all reasons enumerated by Rule 1.16(b)(1)-(6), the precise nature of which cannot be divulged upon counsel from the OBA, counsel seeks to withdraw.
5. There is currently Defendant's Motion to Dismiss pending [Dkt. 73], but the briefing is concluded.
6. Counsel certifies he has served this application upon his clients.
7. Counsel for the Government is aware of counsel's intent to withdraw.
8. Upon entering the Order, counsel will file a certificate of service, stating the date and

manner of service regarding the approved Order.

9. Defendants' address for serving this Motion and the address the approved order will be sent is 21469 Jimbo Road, Thackerville, OK 73459.

Wherefore, the undersigned respectfully prays this Court enter an Order allowing leave to withdraw as counsel of record for Defendants.

s/Daniel J. Card
Daniel J. Card
512 NW 12th Street
Oklahoma City, OK 73103
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580-465-4249

CERTIFICATE OF SERVICE

The undersigned, Daniel J. Card, certifies that the foregoing was served on June 11, 2021, to the following:

Mary Hollingsworth-via CM/ECF
Brienna Strippoli-via CM/ECF

Mail:
Jeffrey and Lauren Lowe
21469 Jimbo Road
Thackerville, OK 73459

s/Daniel J. Card
Daniel J. Card